

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
GREENBELT DIVISION**

HOME CONSULTANTS, INC.

Plaintiff,

v.

RONALD AARON CHAPMAN, *et al.*

Defendants.

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)
)
) Civil Action No. PJM 07 CV-1230
)
)
)

**NOTICE OF DEPOSITION AND REQUEST TO PRODUCE DOCUMENTS
IN AID OF EXECUTION OF JUDGMENT AGAINST RONALD AARON CHAPMAN**

Please take notice that on Tuesday, December 4, 2007, beginning at 12:00 p.m., at the offices of Venable LLP, One Church Street, Fifth Floor, Rockville, Maryland 20850, before a qualified Notary Public, judgment creditor Home Consultants, Inc., will take the deposition upon oral examination, pursuant to Rules 30(b) and 69(a) of the Federal Rules of Civil Procedure, of the following person:

Ronald Aaron Chapman
4301 Cinibar Court
Fort Washington, MD 20744

DOCUMENTS TO BE PRODUCED

Pursuant to Rules 30(b)(5), 34, and 69 of the Federal Rules of Civil Procedure, at the taking of the deposition, Ronald Aaron Chapman is directed to produce for examination the documents identified in attachment A.

DATED this 19th day of November 2007.

Respectfully Submitted,

Ari Karen (Federal Bar No. 13848)

James E. Fagan, III, *pro hac vice*

Venable LLP

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Washington DC 20004

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Counsel for Plaintiff

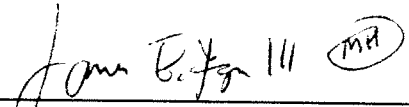
CERTIFICATE OF SERVICE

I hereby certify that the forgoing Notice Of Deposition And Request To Produce Documents In Aid Of Execution of Judgment Against Ronald Aaron Chapman was sent overnight via United Parcel Service on this 19th day of November 2007, to the following:

Ronald Aaron Chapman
4301 Cinibar Court
Fort Washington, MD 20744

AND

Joseph J. Bottiglieri
Craig L. Sarner
BONNER KIERNAN TREBACH & CROCIATA, LLP
1233 20th Street, NW
Suite 800
Washington, D.C. 20005
202-712-7000
Counsel for Defendant RTE Title, LLC



James E. Fagan, III

ATTACHMENT A:
DOCUMENTS TO BE PRODUCED

Judgment creditor Home Consultants, Inc., requests that Gilbert Young produce for inspection and copying each document requested herein, with such production to take place at the taking of Mr. Young's deposition beginning at 3:00 p.m., at the offices of Venable LLP, One Church Street, Fifth Floor, Rockville, Maryland 20850:

1. Any and all documents that indicate where you are employed or otherwise conduct business, including but not limited to any such documents, such as pay stubs or earnings statements, that contain or reveal the following information: (a) the name, address and telephone number of each place of employment or business; (b) the nature of your employment or business; and (c) the amount of income earned as a result of such employment or business.
2. Any and all documents that contain or reveal information regarding your financial net worth in the last five years, including but not limited to any financial statements or other documents evidencing your assets and liabilities during said period.
3. Any and all documents that contain or reveal information regarding corporations, partnerships and business entities of any kind in which you have an ownership interest or had such an interest in the last five years, including but not limited to any such documents that contain or reveal the following information: (a) the type of business in which the entity is engaged; (b) the nature and fair market value of your interest; (c) the identity of the entity's officers, directors, resident agents, co-owners, and/or general partners; and (d) the identity of any other person who has or claims any interest in the entity and the nature and fair market value of said person's interest.

4. Any and all documents that contain or reveal information regarding all monies or consideration of any type owing to you, including but not limited to any such documents that would contain or reveal the amount owed, due date, and factual and legal basis for the obligation.

5. Any and all documents that contain or reveal information regarding each and every parcel of real property, in the State of Maryland or elsewhere, in which you have any interest or have had any interest in the last five years, including but not limited to any such documents, such as the deed or title or instrument under which you hold your interest, that contain or reveal the following information: (a) the real property's location and address; (b) the nature and fair market value of your interest; (c) the identity of any other person who has or claims an interest in the real property and the nature and fair market value of said person's interest; and (d) reference to the deed or instrument under which you acquired title to the interest held.

6. Any and all documents that contain or reveal information regarding all bank accounts, money markets, investment accounts, certificates of deposit, savings and/or checking account, and any other accounts in which you now have or have had an interest in the last five years, including but not limited to any such documents that contain or reveal the following information: (a) name and address of the bank, brokerage, building, savings and loan association, or other financial institution; (b) type and number of account; (c) date the account was opened; (d) balance as of the date these interrogatories were served on you, and the encumbrances thereon; (e) the date the account was closed, if closed; and (f) all transfers or payments of \$1,000 or more in the

last five years, the identify of the person or account to whom the transfer was made, the date of transfer, and the reason for the transfer.

7. Any and all documents that contain or reveal information regarding every motor vehicle, boat, and airplane in which you now hold or have held an interest in the last five years, including but not limited to any such documents, such as the title or instrument under which you hold your interest, that contain or reveal the following information: (a) the make, year, model, mileage, registration number and/or serial number of each; (b) the specific place where each is normally and currently located; (c) the nature and fair market value of your interest (including all assumptions used to arrive at said value); (d) the identify of each person who has or claims an interest in the property and the nature and fair market value of said person's interest (including all assumptions used to arrive at said value); and (e) reference to the title or instrument under which you acquired interest in the property.

8. Any and all documents that contain or reveal information regarding all goods or personal property of any kind, not otherwise responded to in the above requests, in which you now hold or have held an interest in the last five years, including any wares, equipment, computers, merchandise, money, furniture, fixtures, chattels, art, old coins, stamps, jewelry, gems, stocks, bonds, negotiable instruments, patents, copyrights, or other tangible or intangible personal property. Documents to be produced include, but are not limited to, any and all documents that contain or reveal the following information with respect to each such good or personal property identified pursuant to this request: (a) the number owned; (b) the nature and fair market value of your interest; (c) the address

and location of each; and (d) the identity of any other person who holds or claims an interest in the good and the nature and fair market value of said person's interest.

9. Any and all documents that contain or reveal information regarding all leases, contracts, lawsuits and claims of any kind (collectively, "claims") that you now hold or have held against any third party in the last five years, regardless of whether such claim has been asserted, including but not limited to any such documents that contain or reveal the following information: (a) the nature and value of the claim; (b) the identity of documents that support the claim; (c) the identity of the person against whom you have a claim; and (d) the court or agency in which the claim was filed and the relevant case numbers, if applicable.

10. Any and all documents that contain or reveal information regarding all mortgagees and other persons possessing any lien or encumbrance upon all property or properties in which you have an ownership interest, including but not limited to any such documents that contain or reveal the following information: (a) the type of lien or encumbrance; (b) the date incurred or acquired; (c) the face amount thereof; (d) the balance due thereon as of the date the answer is given; (e) the date the balance is due; and (f) whether or not payments are in arrears.

11. Any and all documents that contain or reveal information regarding all chattel or real estate mortgages, leases, or contracts owned by you or by you as a co-owner with any other person or entity at any time in the last five years, unless already fully indicated in the above requests, including but not limited to any such documents that contain or reveal the following information: (a) the nature and fair market value of

your interest and (b) the identity of any other person who owns an interest in the mortgage, lease, or contract and the nature and fair market value of said person's interest.

12. Any and all documents that contain or reveal information regarding all sources and amounts of income in the last five years, other than those fully indicated in the above requests, including but not limited to any such documents that contain or reveal the following information: (a) the annual income received from each source; (b) the adjusted gross income reported to any tax authorities; (c) the taxes paid; and (d) the amount of income anticipated from that source for the next five years.

13. Any and all documents that contain or reveal information regarding all other assets not already described in above requests, including but not limited to any such documents that contain or reveal the following information: (a) a description of the asset; (b) the nature and fair market value of your interest; (c) the asset's location; and (d) the identify of any other person who shares any interest in the asset and the nature and fair market value of said person's interest.

14. For each note, interest in a business entity, or interest in real or personal property of any kind in which you have held an ownership interest in the previous five years but which you no longer hold such interest, any and all documents that contain or reveal information regarding whether the note or interest has been sold, transferred or satisfied, including but not limited to any such documents that contain or reveal the following information: (a) the identity of the person to whom the note or interest was sold, transferred or satisfied and (b) the exact amount of consideration, credit, payment or repayment you received, when you received it, and from whom.

15. Any and all documents that contain or reveal information regarding all persons who have an ownership interest in any property in your possession, including but not limited to any such documents that contain or reveal the nature and fair market value of the person's interest in the property.

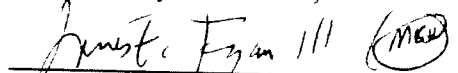
16. Any and all documents that contain or reveal any other information that concerns, relates to, or otherwise makes reference to your financial worth and income that have not already been produced in response to the above requests, including but not limited to your federal and state tax returns for the previous five years.

17. Any and all documents that contain or reveal information regarding all lawyers and accountants whose services you have used in the last five years, including but not limited to any such documents that would describe the services provided by the lawyer or accountant.

18. Any and all documents that contain or reveal information regarding all persons with knowledge of your financial worth and income, including but not limited to any such documents that would identify the nature of each such person's knowledge.

DATED this 19th day of November 2007.

Respectfully Submitted,

 (MKW)

Ari Karen (Federal Bar No. 13848)

James E. Fagan, III, *pro hac vice*
Venable LLP

575 7th Street NW

Washington DC 20004

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